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June 12, 2025

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**Via By ECF**

Honorable Katherine Polk Failla  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**MEMO ENDORSED**

Re: **United States v. Roman Storm**  
**23 Cr. 430 (KPF)**

Dear Judge Failla:

We write on behalf of our client Roman Storm to respectfully request that this Court grant a brief continuance of the deadline to file oppositions to the motions *in limine* and Daubert motions from June 16, 2025 to June 18, 2025. Mr. Storm does not seek to extend or change any other deadlines.

This is the second extension request. The first, which was unopposed by the government, occurred during the May 30, 2025 hearing. The defense asked this Court to move: (1) the motion *in limine* and Daubert motion deadline from June 4, 2025 to June 6, 2025; and (2) the opposition deadline from June 13, 2025, to June 16, 2025, which this Court granted. (5/30/25 Tr. at 23-24.)

The defense has been diligently preparing oppositions; however, the government's motions are extensive and involve numerous, complex issues. (See Dkts. 157, 159.) The government's motions *in limine* are combined in one filing that is over 60 pages (not including exhibits) and raises over 20 distinct issues (e.g., seeking to exclude eight different categories of potential defense argument and evidence). (Dkt. 157.) The government's motion to exclude defense expert testimony is 40 pages (not including exhibits) and seeks to exclude, in whole or in part, the testimony of all five noticed defense experts, plus another potential defense witness. (Dkt. 159.) To have sufficient time to adequately respond to the government's motions, the defense needs two extra days.

The government opposes this request due to "concerns about compressing our busy schedule of trial prep and additional pretrial disclosures. . ." But even if the deadline is continued, the government can mitigate its concern by filing on the original due date, if it wishes. That said, the government asks that if this Court grants Mr. Storm's request that it extend the deadline for it as well. The defense, of course, supports that request and always contemplated seeking a mutual extension.



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For all the above reasons, Mr. Storm respectfully requests a short continuance of the deadline for oppositions from June 16, 2025 to June 18, 2025.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "B. E. Klein".

Brian E. Klein  
Keri Curtis Axel  
Becky S. James  
Kevin M. Casey  
Viviana Andazola Marquez  
WAYMAKER LLP

-and-

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Nicholas D. Pavlis  
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*Attorneys for Roman Storm*

Application GRANTED. The deadline for both the defense and the Government to file their respective oppositions is hereby ADJOURNED to on or before **June 18, 2025**. The Court advises the parties that it will not grant further extension requests regarding this deadline.

The Clerk of Court is directed to terminate the pending motion at docket entry 162.

Dated: June 13, 2025  
New York, New York

SO ORDERED.

A handwritten signature in blue ink, appearing to read "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE